ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
Compliance Evaluation Inspection (CEI) Report

1) Author of Report

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2) Facility Information

Chemical Waste Management, Inc. (CWM)
36964 Alabama Highway 17 North
Emelle (Sumter County), Alabama 35459

EPA ID Number:	ALD000622464
NAICS Code(s):	56221
Telephone:	(205) 652-8100
Website:	www.wm.com/index.jsp

3) Responsible Officials

Mr. Mike Davis, Senior District Manager
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4) Inspection Participants

Mr. Mike Davis, Senior District Manager – CWM
Mr. Al Talbott, Safety Manager – CWM
Mr. Kent Jones, Operations – CWM
Mr. Guy Coghlan, Technical Manager – CWM
Mr. Ricky Burrell, Environmental – CWM
Mr. Paul Howard, H.E. Shop – CWM
Mr. Parvez Mallick – EPA
Ms. Paula Whiting – EPA
Mr. Corey Holmes – ADEM
Mr. Austin Pierce – ADEM
Mr. Jonah Harris – ADEM
Mr. Chris Griffith – ADEM

Ms. Bailee Dykes – ADEM
Mr. Lanny Sasser – ADEM

5) Date(s) of Inspection

March 12, 2018 through March 15, 2018

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) Purpose of Inspection

The purpose of the inspection was to determine CWM's compliance with its Hazardous Waste Facility Permit and all applicable requirements of Division 14 of the ADEM Administrative Code.

8) Facility Description

CWM is a permitted commercial hazardous waste storage, treatment, and disposal facility. The facility occupies approximately 650 acres and includes one active hazardous waste landfill, sixteen closed hazardous waste landfills (which are currently undergoing permitted post-closure care), a hazardous waste treatment operation, several storage areas for hazardous wastes and PCB-contaminated materials, and various ancillary operations (facility maintenance areas, leachate storage tanks, a waste sampling area, an on-site laboratory, etc.). For a detailed description of the facility's hazardous waste management operations, see the Hazardous Waste Inspection Report dated November 29, 2010.

CWM has been in operation at its current location since 1976. The facility currently employs 110 people. CWM's typical hours of operation are between 7:00 a.m. and 3:30 p.m. Monday – Friday. In its most recent notification of regulated waste activity (ADEM Form 8700-12), which was received by the Department on February 20, 2017, CWM identified itself as a permitted treatment, storage, and disposal facility of hazardous waste; a large quantity generator of hazardous waste; a used oil generator; a transporter of hazardous waste, used oil, and universal waste; a transfer facility for both hazardous waste and used oil; and a large quantity handler of universal waste.

9) Observations

At approximately 1:00 p.m. on March 12, 2018, representatives of the U.S. Environmental Protection Agency (Ms. Whiting and Mr. Mallick) and representatives of the Department (Ms. Dykes, Mr. Pierce, Mr. Griffith, Mr. Holmes, Mr. Harris and Mr. Sasser) arrived at the facility and met with representatives of CWM (Mr. Talbott, Mr. Jones, Mr. Coughlin and Mr. Ricky Burrell). At that time, the inspection participants identified themselves, discussed the purpose of the inspection, and reviewed applicable safety precautions. Following this opening conference, the inspection participants broke into two groups to begin the inspection. Group 1 (Mr. Harris, Mr. Griffith, Mr. Sasser and Mr. Mallick) was responsible for the walk-through inspection of Area A (Outlined in red

on Attachment A). Group 2 (Mr. Holmes, Mr. Pierce, Ms. Dykes and Ms. Whiting) was responsible for the walk-through inspection of Area B (Outlined in Green on Attachment A). The following units were inspected on March 12, 2018:

A) Robbie D. Wood Transfer Facility (Mr. Coghlan and Group 2)

The inspection report for this facility will be independent of this report.

B) Mount Hebron Rail Facility (Mr. Coghlan and Group 2)

Hazardous waste railway transfer facility owned and operated by CWM. One 55-gallon satellite accumulation (SA) drum designated for personal protective equipment (PPE) was observed labeled and closed. No rail cars were present at the time of the inspection.

No areas of concern were noted during this part of the inspection.

C) Building 1000 (Bulk Sampling Station) (Mr. Jones and Group 1)

Building 1000 is a corrugated metal building where bulk shipments of waste are sampled prior to being accepted by CWM. Transport vehicles carrying bulk wastes destined for disposal at the facility pass underneath a metal scaffold within the building; and CWM employees stationed on the scaffolding obtain grab samples of the wastes. The building is surrounded by a gravel lot, where containers are temporarily staged before and / or after samples are taken. Once the sample results are obtained, the staged trucks are directed to the landfill or to bulk stabilization.

No areas of concern were noted during this part of the inspection.

D) Building 1200A (Bulk Stabilization Building) (Mr. Jones and Group 1)

Mr. Larry Eutsey, control room operator, greeted us upon arrival. Building 1200A is a corrugated metal building where permitted treatment of hazardous wastes takes place. The building houses two stainless steel-lined vats (T-

1201A and T-1202A) in which hazardous wastes are mixed with stabilizing agents (ferrous sulfide, lime kiln dust, etc.) prior to being disposed on-site. Each vat is equipped with a separate / independent dust control system. The East and West dust collection silos associated with those dust control systems are located in separate rooms within the building. Each silo empties into its own 25 yard dust collection box (APCS #1 and APCS #3). The boxes are emptied every 2 or 2.5 months.

This building is a permitted treatment and storage area. Appropriate warning signs were posted on all doors / entrances. One load of waste was being stabilized at the time of the inspection. A collection container was staged underneath each dust collection silo. Both

containers were dated and labeled with the words "Hazardous Waste".

One personnel door leading into the containment building could not be closed entirely (See Attachment B). Facility personnel were informed of this area of concern at the time of the inspection.

E) Building 2000 (Biological Treatment Unit) (Mr. Jones and Group 1)

Building 2000 is a concrete-floored corrugated metal building that consists of two completely separate sections. The largest section houses CWM's biological treatment unit, an on-site wastewater treatment plant, in which leachate removed from Trench 22 is treated (treated wastewater is used as makeup water in CWM's stabilization process). The smallest section is a macroencapsulation area where macro boxes and macro bags are sealed after being filled with waste (wastes are added to the macro boxes / bags in Building 1200A).

This building is a permitted storage and treatment area. One 20-yard sealed macro roll-off box and one 20-yard unsealed macro roll-off bag were staged in the macroencapsulation area.

Sludge from the biological treatment unit (F039) is shipped off-site for incineration.

No areas of concern were noted during this part of the inspection.

F) Building 2200 (Bulk Container Storage Unit) (Mr. Jones and Group 1)

Building 2200 is an open-sided corrugated metal building where bulk containers (roll-off containers, tanker trucks, super sacks, etc.) of hazardous waste and PCB-contaminated materials are stored prior to being disposed. The building has a maximum capacity of 105 roll-off containers. This building is a permitted container storage area. The concrete base that underlies the building is coated with a chemical-resistant polymer. Rubber mats have been bolted onto the floor in part of this building (CWM is allowed to store only non-liquid wastes in this portion of the building).

Approximately 65 roll-off containers and 4 tractor trailers were staged in this building at the time of the inspection. Two metal 55-gallon SA drums of PPE were also in the building. These two metal SA drums were labeled with the words "Hazardous Waste" and closed.

The following areas of concern were observed during this part of the inspection:

1) Roll-off RO24 had a torn tarp and was not considered closed (See Attachment A).

2) Roll-off RO25 had a tarp that was not sufficient to be used as a cover, so the container was not considered closed (See Attachment A).

3) Roll-off RO28 was missing the accumulation start date (See Attachment A). This issue was corrected during the inspection.

The participants concluded the inspection on the first day at approximately 4:00 p.m.

At approximately 8:30 a.m. on March 13, 2018, the inspection resumed with the same participants from the previous day. The following units were inspected:

G) Building 708 (Laboratory) (Mr. Coghlan and Group 2)

CWM's on-site laboratory is divided into four rooms: a wet chemistry lab, a sample storage room, an inorganic lab, and an organic prep lab. Confirmatory testing (analysis of wastes received by CWM to verify the accuracy of the waste profile and assign a management method to the wastes) and post-treatment testing (analysis of wastes that have been stabilized on-site to verify that they have been sufficiently treated to meet applicable land disposal restrictions) are performed in the laboratory. Once testing is complete, the samples are returned to their original containers. The tops of these containers are marked with the applicable identifying codes (management method code, profile number, etc.). These containers are sorted by compatibility and placed in the sample storage room prior to being placed in lab packs and disposed in CWM's on-site landfill.

Mr. Coghlan began the tour in the wet chemistry lab. Several SA containers ranging in size from 5 to 55-gallons were inspected. All containers were closed and appropriately labeled.

The sample storage room held several containers of various sizes. All sample containers were closed and labeled with words identifying the contents. One 5-gallon container from Alabama Power that did not have a visible accumulation start date (determined to be September 3, 2017) was sent for stabilization before the closing conference.

The inorganic lab contained two 5-gallon containers of ICP waste from two Thermo-ICP machines. Both containers were closed, labeled and dated.

After inspecting one 30-gallon metal SA step can containing lab trash that was closed and labeled, Mr. Coghlan concluded the tour of the organic lab.

On March 14, 2018, inspectors were escorted back to an area outside the building to inspect two 5,000-gallon above ground storage tanks and one 500-gallon underground tank. The sink water from the lab in Building 708 drains to the 500-gallon underground storage tank that is then pumped into the 5,000-gallon above ground tank designated for this water. The water from this tank is non-hazardous and is sent for slurry in the hazardous waste stabilization process. The other 5,000-gallon above ground tank is used to store argon.

No areas of concern were noted during this part of the inspection.

H) Building 300 (Heavy Equipment Maintenance) (Mr. Coghlan and Group 2)

Building 300 houses CWM's heavy equipment maintenance shop, a corrugated metal garage in which maintenance is performed on the facility's heavy equipment (trucks, excavators, etc.). Used oil generated in the shop is collected in small transfer containers (metal 20-gallon drums with wheels and removable lids, metal 35-gallon drums with wheels and funnels, etc.). The contents of these containers are pumped directly into a used oil storage tank located outside, behind Building 300.

The following was observed during the tour of the shop:

1) One 30-gallon metal SA step can for aerosol cans that was closed and labeled.

2) Two 55-gallon drums of drained oil filters, diesel and gas (D018). Both drums were closed and labeled.

3) One 15-gallon container of used oil that was not closed at the time of the inspection. This drum was closed during the inspection.

4) One 1,000-gallon used oil tank that was labeled and in secondary containment.

5) 12 lead acid batteries were observed outside of building 300 waiting to be returned to the vendor (Interstate Batteries) for recycling.

The 15-gallon used oil container that was not closed at the time of the inspection was noted as an area of concern.

I) Building 606 (Facility Maintenance Shop) (Mr. Coghlan and Group 2)

Building 606 currently houses CWM's general maintenance shop (which serves as the base of operations for maintenance activities performed on the facility's buildings, structures and stationary equipment).

One 30-gallon metal SA step can containing aerosol cans was closed and labeled.

No areas of concern were noted during this part of the inspection.

J) Building 406 (Bulk Container Storage Area) (Mr. Coghlan and Group 2)

Building 406 consists of a corrugated metal roof suspended over a gravel lot. The north side of Building 406 is used as a storage area for clean equipment and empty containers. The south side of the building is a permitted storage area for bulk containers of hazardous waste. The portion of the building in which hazardous wastes are stored is equipped with a secondary containment structure (a coated concrete pad surrounded by coated concrete berms). Signs

bearing the words "Danger - No Smoking" and "South End of Building 406- Permitted Storage - Solid Storage Only- No Liquids" were posted near the southern portion of the building. The hazardous waste storage area has a maximum capacity of fifteen roll-off containers.

RO56, a 20-yard roll-off, located in the hazardous waste storage area was labeled and dated correctly; however, the tarp covering the roll-off was not long enough to cover the entire roll-off, so the container was not considered closed. This was noted as an area of concern and corrected by the end of the day.

K) Building 520 (Tank Management Unit) (Mr. Coghlan and Group 2)

Building 520 consists of a 200,000-gallon hazardous waste storage tank (Tank 520) and two separate staging areas for tankers and / or roll-off containers. The tank is surrounded by a concrete secondary containment system (a concrete base surrounded by four-foot-high concrete walls) that is coated with a chemical-resistant polymer. Both container staging areas (which consist of corrugated metal roofs suspended over bermed concrete pads) have a maximum Capacity of two tankers / roll-off containers. Both the concrete pads and the concrete berms are coated in a chemical-resistant polymer. Tank 520 has been out of service since November 16, 2017.

No areas of concern were noted during this part of the inspection.

L) Building 402 (Contract Maintenance) (Mr. Coghlan and Group 2)

Building 402 is a 6-bay corrugated metal garage that is used by third-party contractors to perform maintenance and repairs on contractor-owned / operated equipment. The contractor maintenance shop is currently operated by Robbie D. Wood, Inc. (ALD067138891).

One 55-gallon SA drum of hazardous waste and one 55-gallon drum of used oil were found in this area. Both drums were closed and labeled correctly.

No areas of concern were noted during this part of the inspection.

M) Building 604 (Container Storage Area) (Mr. Coghlan and Group 2)

Building 604 houses a storage area for hazardous wastes and PCB-contaminated materials. The building's floor has been covered by an impervious sheet of stainless steel that acts as a secondary containment device. There were no hazardous waste containers in the building at the time of the inspection. Two 55-gallon SA drums, one containing wash water and the other rinse water, were observed. Both drums were closed and appropriately labeled.

No areas of concern were noted during this part of the inspection.

N) Building 600 (Container Storage Area) (Mr. Coghlan and Group 2)

Building 600-a split-level corrugated metal building with a concrete floor-is a storage area for hazardous wastes and PCB-contaminated materials. The building's floor has been coated with a chemical- resistant polymer, which acts as a secondary containment device. A tank farm consisting of the following tanks is located on the lower floor: Tank 634 (a storage tank for PCB-bearing oils), Tank 635 (a storage tank for PCB-bearing oils), and Tank 636 (a storage tank for unused mineral oil, which is uses as a flush solution for cleaning PCB-contaminated materials). Tank T-635 was labeled "PCBS", Tank T-636 was labeled "Mineral Oil" and Tank T-634 was labeled "PCBS". Secondary containment was adequate and coated.

An organic waste pumping station (which is used to transfer organic wastes into tanker trucks) is located on the upper floor. Equipment associated with the pumping station (pipe joints, flanges, valves, etc.) that comes into contact with organic hazardous wastes is subject to Subpart BB tagging requirements. A legible tag was affixed to each piece of equipment connected to the pumping station.

No areas of concern were noted during this part of the inspection.

O) Building 603 (Container Storage Area) (Mr. Coghlan and Group 2)

Building 603 is divided into three areas. Various hazardous wastes are stored in the eastern portion of the building. Universal wastes are stored in the central portion of the building. Mercury wastes are stored in the western portion of the building. Building 603 is constructed of corrugated metal and has a coated concrete floor.

The building contained approximately One hundred thirty-four 55-gallon drums, five 5-gallon containers and three 250-gallon totes of hazardous waste, along with, five 1 cubic yard boxes of universal waste. All of the containers inspected were closed, labeled and marked with accumulation start dates indicating storage under one year.

No areas of concern were noted during this part of the inspection.

P) Building 700 (Container Management Area) (CWM Personnel, Group 1 and Group 2)

Mr. Mark West, operations supervisor, joined us for this part of the inspection. Building 700 includes the following areas: a permitted hazardous waste container storage area (which occupies the majority of the building) and a hazardous waste consolidation area (which is located on the north side of the building). Containers of hazardous waste, used oil, universal waste, and PCB- contaminated wastes are stored for up to one year in the hazardous waste container storage area. In the hazardous waste consolidation area, containers of hazardous waste are bulked into larger containers by inserting a pipe into the bung hole of a 55-gallon drum and pumping its contents into a tanker car or other bulk container. The pumping station and associated piping is subject to Subpart BB. The building is constructed of cinderblock

and corrugated metal; it is equipped with an impervious stainless steel floor.

The floor / secondary containment system within the container storage area appeared to be in good condition. All Piping and flanges associated with the pumping station was appropriately labeled with Subpart BB tags. Signs bearing the words "Entry Prohibited-All Personnel Must Enter and Exit Through Decon Zone", " Danger - No Smoking", and "Caution - Contains PCBs" were posted on the exterior of the building. Signs bearing the words "No Smoking", "Decon Zone", "Danger - Hard Hats, Ear and Eye Protection Required Beyond This Point"; "Visitors Must See Area Supervisor Before Entering", and "Caution - Contains PCBs" were posted on the entrance to the building.

The North end of this building was inspected on March 14, 2018. One tanker (labeled "Hazardous Waste – Drum Process" and dated 2/19/18) was observed being filled. Approximately one hundred 55-gallon drums, twelve 250-gallon totes and one 20 yard roll-off of hazardous wastes were staged in this area during the inspection. All containers were labeled, closed and marked with accumulation start dates.

No areas of concern were noted during this part of the inspection.

Q) Building 702 (Container Storage Area) (CWM Personnel, Group 1 and Group 2)

Mr. West accompanied the groups during this portion of the inspection. Building 702 is connected to Building 700 via an enclosed conveyor system and is used as an additional storage area for containers of hazardous waste. The building is constructed of cinderblock and corrugated metal and sits atop a concrete slab that has been coated with a chemical-resistant polymer. The floor/ secondary containment system within the container storage area appeared to be in good condition. Warning signs similar to the signs posted outside of Building 700 were posted on the exterior of Building 702.

Approximately two hundred ninety-nine containers of various shapes and sizes (metal 55-gallon drums, plastic 55-gallon drums, cardboard boxes, metal 5-gallon buckets, fiberboard drums, plastic 250-gallon totes, super sacks, etc.) were staged in Building 702 at the time of the inspection. Each container was closed, labeled and dated with the accumulation start date.

No areas of concern were noted during this part of the inspection.

R) Building 602 (Non-Hazardous Waste Storage) (CWM Personnel, Mr. Pierce and Mr. Griffith)

Corrugated metal building used to store various non-hazardous items. No regulated wastes were present at the time of the inspection.

No areas of concern were noted during this part of the inspection.

S) Tank Farm 1400 (Tank Farm) (Mr. Jones and Group 1)

Building 1400 consists of sixteen hazardous waste storage tanks (Tank 1405, Tank 1406, Tank 1407, Tank 1408, Tank 1409, Tank 1410, Tank 1411, Tank 1412, Tank 1413, Tank 1414, Tank 1415, Tank 1416, Tank 1417, Tank 1418, Tank 1419 and Tank 1420) constructed on a concrete secondary containment system. Four of these tanks have a capacity of approximately 500,000-gallons. The remaining twelve tanks have a capacity of approximately 250,000-gallons. The containment system- a concrete pad surrounded by short concrete walls- is coated in a chemical-resistant polymer. A loading / unloading area for tanker trucks is located adjacent to the tank farm. The loading / unloading area consists of a corrugated metal roof suspended over a bermed concrete pad. Both the concrete pad and the concrete berms are coated in a chemical-resistant polymer.

This area is a permitted hazardous waste storage area. Signs bearing the words "Watch Out For Slick Spots" and "Authorized Personnel Only" were posted at the perimeter of the tank farm. Each of the sixteen tanks listed above appeared to be in good condition and were labeled with the words "Hazardous Waste". One satellite accumulation container (a metal 55-gallon drum) of PPE was staged near the loading / unloading area.

The chemical-resistant coating on the secondary containment structures surrounding and underlying the tank farm and the loading / unloading area was worn away and chipped in several areas (See Attachment B). This was noted as an area of concern at the time of the inspection. Facility personnel were aware of the damage to the secondary containment coating. A remedial work order (RWO#05550) to recoat the area was opened on July 26, 2017.

T) Building 1700 (Leachate Storage Tanks) (Mr. Jones and Group 1)

Building 1700 is a corrugated metal building that houses two double-walled leachate storage tanks (Tank 1701 and Tank 1702). This and two other buildings (Building 1703 and Building 19-A) are referred to as "Unit 1700" in CWM's permit. Both tanks have a capacity of approximately 25,000-gallons. The building's concrete floor (which is coated with a chemical-resistant polymer) provides additional secondary containment for the tanks. Both tanks in building 1700 appear to be in good condition and were labeled with the words "Hazardous Waste".

Residue from a spill / release of leachate (See Attachment B) was observed on the floor of the building (within the secondary containment structure). The spill apparently occurred approximately one year before the date of the inspection (the work order to clean up the release - RWO#04964 - was opened on 3-15-17). The amount of time taken to clean up the spill was noted as an area of concern at the time of the inspection. Facility personnel cleaned up the residue and closed the work order during the inspection.

U) Building 1703 (Leachate Storage Building) (Mr. Jones and Group 1)

Building 1703 is a corrugated metal building that houses two double-walled leachate storage tanks (Tank 1703 and Tank 1704). This and two other buildings (Building 1700 and Building 19-A) are referred to as "Unit 1700" in CWM's permit. Both tanks have a capacity of approximately 25,000-gallons. The building's concrete floor (which is coated with a chemical-resistant polymer) provides additional secondary containment for the tanks

No areas of concern were noted during this part of the inspection.

V) Building 19-A (Leachate Storage Building) (Mr. Jones and Group 1)

Building 19-A is a corrugated metal building with a concrete floor that houses one leachate storage tank (T-A) that has a capacity of approximately 2,500-gallons. This and two other buildings (Building 1700 and Building 1703) are referred to as "Unit 1700" in CWM's permit. The leachate storage tank was labeled with the words "Hazardous Waste" and appeared to be in good condition. The building's concrete floor (which is coated with a chemical-resistant polymer) provides additional secondary containment for the tank.

No areas of concern were noted during this part of the inspection.

W) Building 900 (Wheel Wash Station) (Mr. Jones and Group 1)

Building 900 is a wheel wash station. In order to prevent possible environmental contamination, vehicles / equipment (such as trucks and excavators) that operate in the active landfill are washed at Building 900 prior to exiting the landfill. The building (a corrugated metal structure constructed atop a concrete pad) includes a manual wash bay and an automatic wash bay. Wash water generated in this area is collected and recycled in a wastewater recirculation system that consists of four tanks (T-901, T-902, T-903, and T-904). The first is an underground storage tank in which used rinse water is captured. The second is a treatment tank for used rinse water. The third is a separation tank (a stationary roll-off container). The fourth is a storage tank for clean (recycled) wash water.

The abovementioned roll-off container of hazardous waste was partially covered (a portion of the top of the container was open so that waste water could be added to it), labeled with the words "Hazardous Waste" and marked with an accumulation start date.

No areas of concern were noted during this part of the inspection.

The participants concluded the inspection on the second day at approximately 3:00 p.m.

At approximately 8:25 a.m. on March 14, 2018, the inspection resumed. Mr. Mike Davis joined the participants from the previous two days. The following units were inspected:

X) Trench 22 (Active Landfill)

Mr. Burrell and Mr. Jones escorted Mr. Harris, Mr. Pierce, Mr. Griffith, Mr. Mallick and Mr. Sasser during this part of the inspection. Mr. Jones, Mr. Harris. Mr. Mallick and Mr. Sasser donned appropriate PPE and performed a visual inspection of the active cell.

Trench 22, the current active hazardous waste landfill, has a total capacity of 5,259,358 cubic yards and is divided into four cells. Cell #4 is currently active. An alpha-numeric grid (which is used to document the location of the wastes deposited in the landfill) was displayed along each edge of Cell #4. Mr. Harris noted the location (using the grid system) of two supersacks of non-hazardous waste located in the landfill. One was located between coordinates P-13 and Q-14; the other was located between coordinates N-13 and O-14. This information was later compared to CWM's disposal logs to ensure that the locations were recorded correctly.

The outside slope of the active cell appeared to be appropriate. There were some minor trenching issues associated with erosion present on the slope. Mr. Burrell produced a work order noting these issues and corrective action measures to be taken to fix the erosion.

No areas of concern were noted during this part of the inspection.

Y) Building 703 –A (Container Storage Area)

Building 703-A consists of a corrugated metal roof suspended over a bermed concrete pad. The pad and the berms are coated in a chemical-resistant polymer. The building has a maximum capacity of three roll- off containers.

Mr. Coghlan and Mr. West escorted Ms. Dykes, Mr. Holmes and Ms. Whiting during this portion of the inspection. The floor / secondary containment system appeared to be in good condition. No waste was present at the time of the inspection.

No areas of concern were noted during this part of the inspection.

Z) Closed Landfills (Trenches Undergoing Post-Closure Care), Monitoring Wells and Perimeter Fence

Mr. Burrell accompanied Mr. Pierce, Mr. Griffith and Mr. Sasser on a tour of CWM's closed landfills, groundwater monitoring system and the facility's perimeter fence.

The following closed hazardous waste landfills are currently undergoing post-closure care at the site: Trenches 8, 9, 10, 11, 12, 12A, 13, 13A, 14, 15, 16, 17, 18, 19, 20, and 21. All sixteen of these landfills have been capped and covered with a layer of live vegetation. CWM's groundwater monitoring program currently consists of 82 wells, of which, 64 wells are used to monitor the closed trenches. Signs bearing the words "Caution - Closed Hazardous Waste Landfill - Minimize Actions Affecting Closure Liner Integrity" were posted around the

perimeter of each closed landfill. The caps/ vegetative covers on 12 of the closed landfills inspected appeared to be in good condition. No stressed vegetation, ponding, or evidence of erosion was noted.

The following groundwater monitoring wells were observed at the time of the inspection: SM-02, SM-03, SM-05, SM-07, SM-12, SM-12A, SM-13, SM-14, SM-14A, SM-15, SM-18, SM-18A, SM-18B, SM-18C, SM-18D, SM-22, SM-31, SM-32, SM-36, SM-37, CMI-1, CMI-3 and RCRA-6. All groundwater monitoring wells observed at the time of the inspection appeared to be in good condition. The casing of each well was locked and clearly labeled with an identifying number.

CWM's facility is surrounded by a chain-link perimeter fence designed to prevent unknowing / unauthorized access of people and livestock to the active portion of the facility. The perimeter fence and all appropriate signage appeared as if it was being maintained.

No areas of concern were noted during this part of the inspection.

The inspectors who were not participating in any facility walk-throughs began a review of the facility's records. Once every area of the facility had been inspected, all inspectors participated in the record review. CWM provided two conference rooms for this review. The following documents were reviewed at that time: CWM's Biennial Report, ADEM Form 8700-12, incoming manifests (for wastes accepted by CWM), outbound manifests (for wastes shipped off-site by CWM), records of inspections of CWM' s hazardous waste storage areas, records of inspections of CWM' s hazardous waste storage tanks, process logs for the stabilization unit, inspection and maintenance logs for units subject to Subpart BB and Subpart CC, bulk container transfer logs, tank integrity tests, burial coordinate logs, closure / post-closure plans, financial assurance documents, the facility's contingency plan, records of hazardous waste management training provided to CWM's employees, job titles / descriptions for employees that manage hazardous waste, CWM's waste analysis plan, CWM's SPCC plan, groundwater monitoring reports, work orders for maintenance on all hazardous waste management units at the site and selected waste profiles.

The inspectors' review and evaluation of these documents revealed the following:

- Nelson Sturdivant was listed as the Primary Emergency Coordinator in CWM's Contingency Plan, but is no longer employed by CWM.

The participants concluded the inspection on the third day at approximately 3:00 p.m.

10) Summary

Based on the observations made during the inspection, CWM appears to be a treatment, storage, and disposal facility; a large quantity generator of hazardous waste; a used oil generator; a transporter of hazardous waste, used oil, and universal waste; and a large quantity handler of universal waste. The following areas of concern were noted at the time of the inspection:

- One 15-gallon container of used oil located in building 300 was open. The container was closed during the inspection.
- The tarp used to cover a 20-yard roll-off (RO56) in Building 406 was not long enough to cover the entire container. The tarp was replaced by the end of the second day of the inspection.
- A personnel door leading into Building 1200A would not close entirely.
- The tarp used to cover a 20-yard roll-off (RO24) in Building 2200 was torn.
- The tarp used to cover a 20-yard roll-off (RO25) in Building 2200 was not long enough to cover the container.
- One 20-yard roll-off (RO28) located in Building 2200 was not labeled with an accumulation start date. This was corrected during the inspection.
- The secondary containment for Tank Farm 1400 is chipped and damaged. RWO#05550, which was issued on July 26, 2017, addresses the secondary containment.
- Residue from a leak or spill located in the secondary containment of Building 1700 had not been removed in a timely manner. RWO#04965 was opened on March 15, 2017, and the residue had not been removed at the time inspection. The residue was removed after the inspection of Building 1700 by the end of the second day.
- The Primary Emergency Coordinator listed in CWM's Contingency Plan needs to be updated to reflect current CWM personnel.

At the conclusion of the inspection, the inspectors held a closing conference with representatives of CWM (Mr. Davis, Mr. Talbott, Mr. Burrell, Mr. Jones, Mr. Howard, and Mr. Coghlan). During the meeting, the inspectors reviewed and discussed their observations, presented their findings to CWM's representatives, and provided CWM's representatives with an opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* describing the areas of concern listed above. Mr. Davis accepted the report on behalf of CWM. The inspectors concluded the closing conference and departed the site at approximately 9:30 a.m. on March 15, 2018.

11) Signed

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Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Land Division

March XX, 2018
Date

12) Concurrence

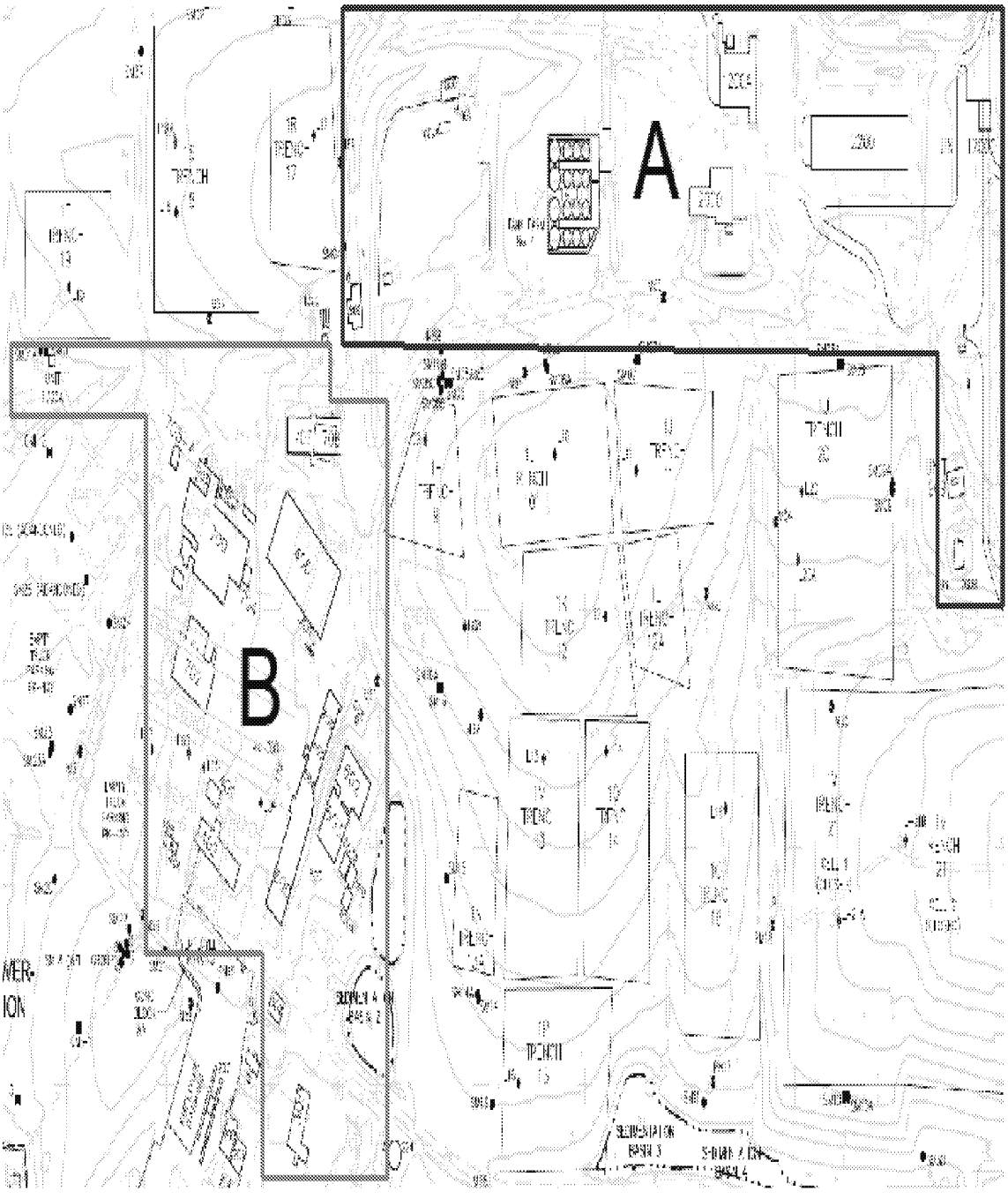
_____
Brent A. Watson, Chief
Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Land Division

March XX, 2018
Date

Attachments:

A) Inspection Areas
B) Photographs
B) Preliminary Inspection Report

ATTACHMENT A:
INSPECTION AREAS

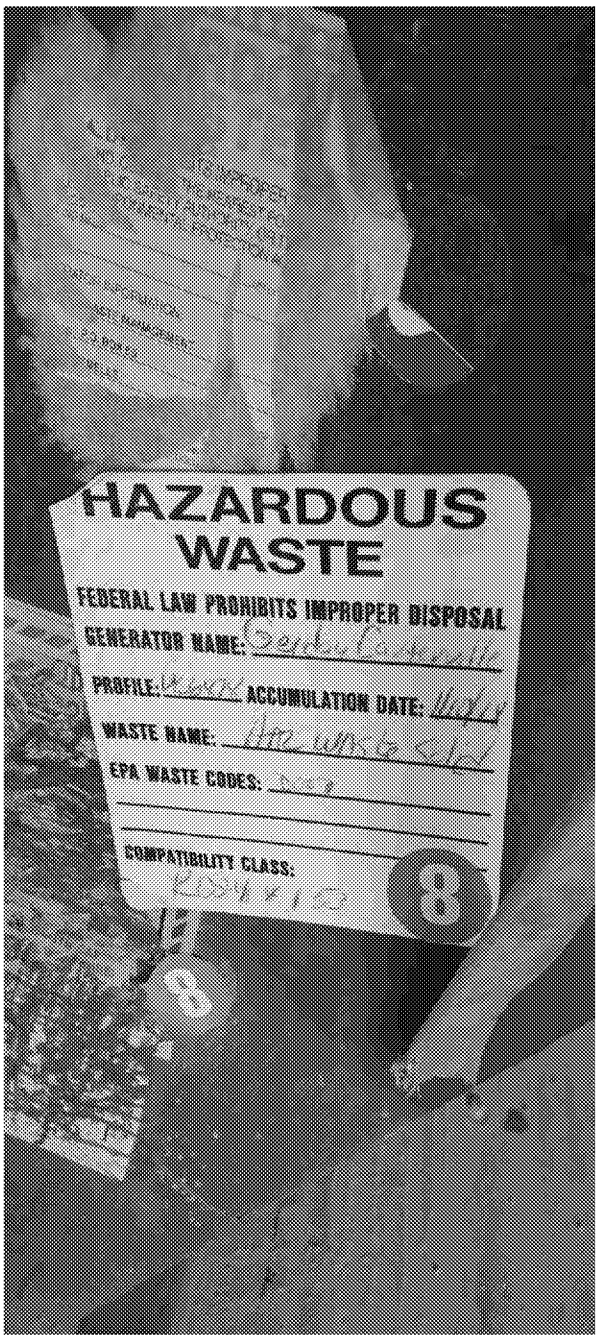


ATTACHMENT B:
AREAS OF CONCERN

Building 1200A Personnel Door

ADEM

RO24

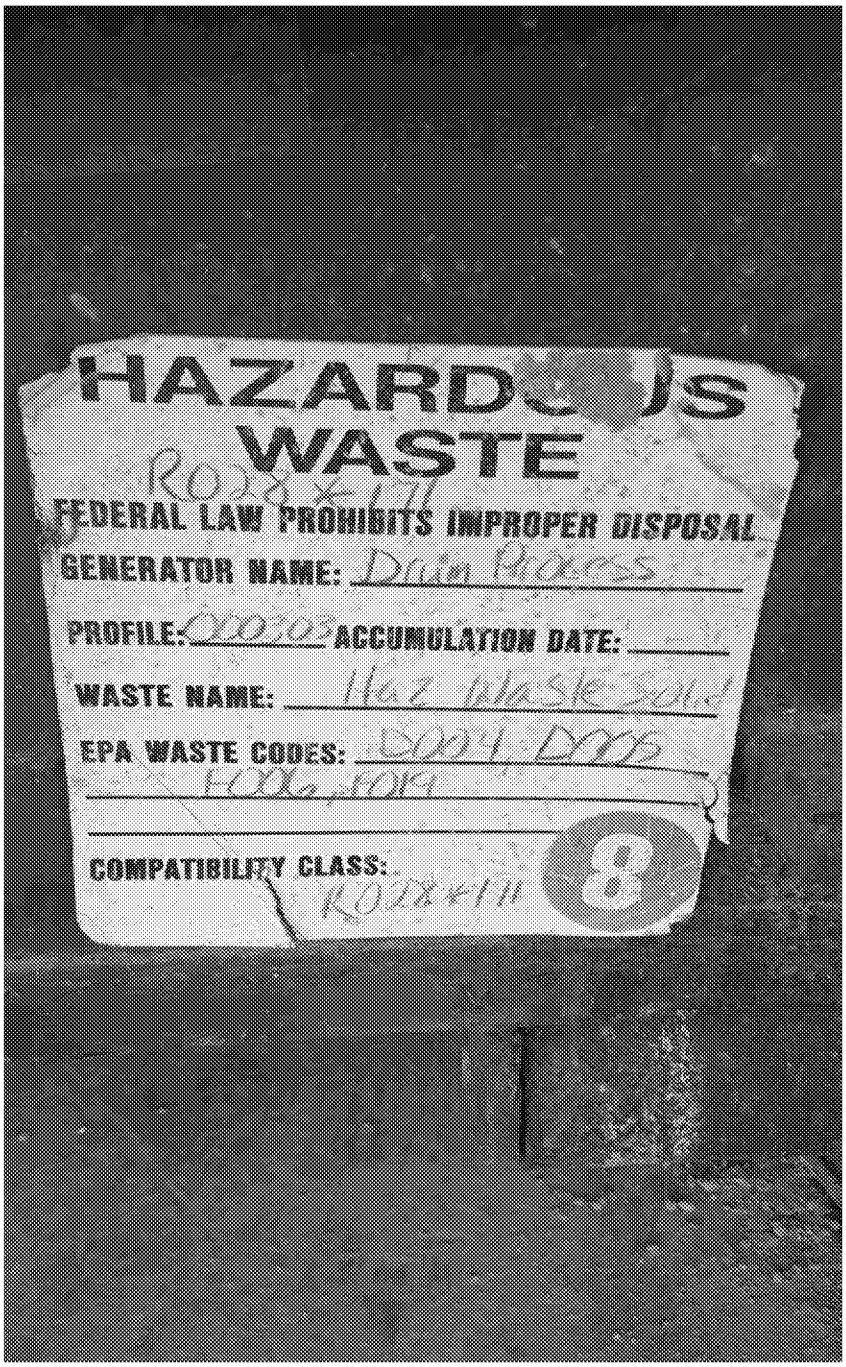


ADEM

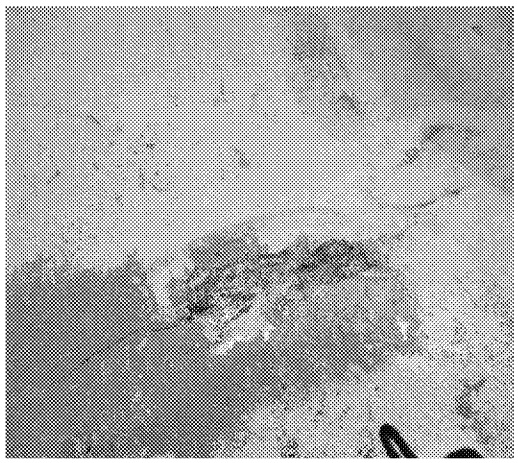
RO25

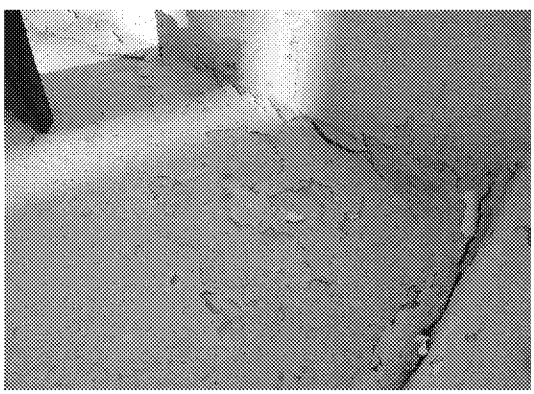
ADEM

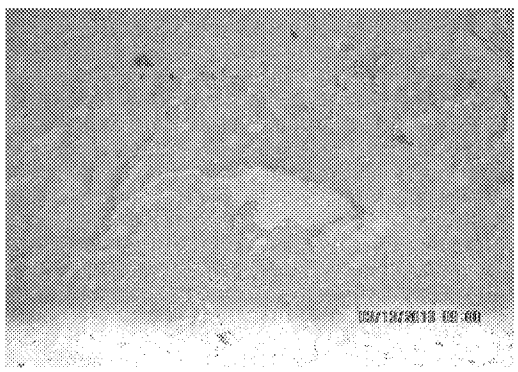
RO28

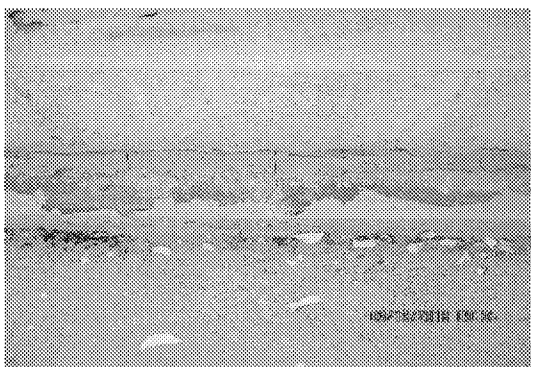

HAZARDOUS
WASTE
RO28 #11
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
GENERATOR NAME: Drip Rites
PROFILE: 00302 ACCUMULATION DATE:
WASTE NAME: Haz Waste Solid
EPA WASTE CODES: D004 D005
D006 D018
COMPATIBILITY CLASS:
RO28 #11
8

Tank Farm 1400 Secondary Containment









ADEM

Building 1700 Residue from a Spill / Release of Leachate

ATTACHMENT C:
PRELIMINARY INSPECTION REPORT

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PRELIMINARY INSPECTION REPORT

FACILITY NAME			EPA ID NUMBER
Chemical Waste Management, Inc.			ALD000622464
STREET ADDRESS: 36964 Alabama Hwy 17 N.	CITY: Emelle	COUNTY: Sumter	ZIP CODE: 35459
TELEPHONE: (205) 652-8100	DATE OF INSPECTION: 3/12/18 - 3/15/18		PAGE 1 OF 1

OBSERVATIONS

Building 300 (Heavy Equipment Maintenance)
- 1 used oil container open

Building 406 (Solids Containment Building)
- 1 Roll-off not completely closed

Building 1200-A (Bulk Stabilization)
- Containment building door will not close

Building 2200 (Bulk Storage)
- R024 tarp was torn / not closed
- R025 was not covered
- R028 had no accumulation start date

Tank Farm 1400
- Secondary containment coating was chipping

Building 1700 (Leachate Storage)
- Residue in secondary containment had not been removed in a timely manner.

Contingency Plan
- Emergency Coordinator needs to be updated (Primary)

This information is provided to call your attention to these areas of potential noncompliance at the earliest possible time. This report does not constitute a Notice of Violation nor a compliance order issued pursuant to 22-30-19 of the Alabama Hazardous Waste Management and Minimization Act and may not be a complete listing of all areas of noncompliance which may be identified as a result of this inspection.

If you have any questions or wish to discuss this action you may contact Lanny Sasser

by telephone at (334) 271-7768 or by email at msasser@adem.alabama.gov @adem.state.al.us

Signature of Preparer: [signature] Date 3/15/18

The undersigned person hereby acknowledges that he/she received a copy of this report and has read and understands the same.

SIGNATURE	PRINTED NAME
[signature]	Michael T. Davis
TITLE: [illegible]	DATE: 3-15-18

ADEM Land / Form 19 M8 03/08

02796 ALD000622464 119 201804XX HWTM CWM CEI Report